



JAMES A. MORRIS
Attorney at Law
jmorris@jamlawyers.com
Licensed in CA, NY, TX, PA and CO
Board Certified in Personal Injury Trial Law
AV Rated Pre-Eminent Martindale Hubbell

SHANE E. GREENBERG
Attorney at Law
sgreenberg@jamlawyers.com
Licensed in CA

October 30, 2020

VIA ECF

The Honorable Freda L. Wolfson, Chief Judge
United States District Court – District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Courtroom 5E
Trenton, NJ 08608

Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation – MDL 2738 Justice v. Johnson & Johnson, et al.*, Case No. 3:18-cv-00333

Dear Chief Judge Wolfson:

This letter is to update the Court and defense counsel with regard to Plaintiff's efforts to comply with her obligation to provide core and other medical records. Plaintiff's counsel has followed up with Record Grabber, Plaintiff's record retrieval service, on a daily basis, by both phone and e-mail, to obtain status and the necessary records. Plaintiff's counsel did obtain Dr. Messing's records and immediately uploaded them to MDL Centrality on October 27, 2020. Plaintiff's counsel is informed and believes, based upon the information provided to her, that the HEB core records should be received by Wednesday, November 4, 2020, and those records will be uploaded to MDL Centrality immediately upon receipt. It is Plaintiff's understanding and belief that the delay in receiving medical records is due to reduced staffing because of COVID-19.

If Plaintiff's case is dismissed, she will suffer irreparable harm, especially in light of the fact that records are diligently being gathered and should be available, at the latest, by Tuesday, November 2, 2020.

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Thank you for your consideration of this matter.

Respectfully submitted,

/s/ James A. Morris, Jr.

James A. Morris, Jr.
MORRIS LAW FIRM
4001 West Alameda Avenue, Suite 208
Burbank, CA 91505
Tel: (747) 283-1144
Fax: (747) 283-1143

Attorneys for Plaintiff,
JULIE MACLIN aka JULIE JUSTICE

cc: All Counsel of Record (via ECF)